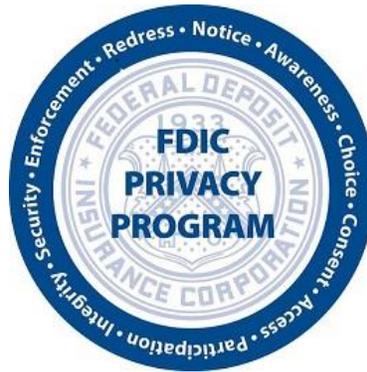


Privacy Threshold Analysis (PTA)
and/or Privacy Impact Assessment (PIA)

for

Adobe Connect



Date Approved by Chief Privacy Officer (CPO)/Designee: 3/25/19

PTA/PIA TEMPLATE VERSION 1.9 - August 2017

SECTION I – OUTSOURCED INFORMATION SERVICE DESCRIPTION

1. Describe the outsourced service and its purpose. The Adobe Connect service is a web-based service on an Adobe-proprietary website that provides a virtual training classroom environment. The interface that Adobe Connect uses is similar to online meeting services such as Webex or Skype, where FDIC's Corporate University (CU) instructors conduct training courses for examiners and also have leadership-type courses where they can present the material and have PowerPoint slides displayed during instruction. CU administrators will set up and configure the virtual classrooms and are able to upload the training course material for participating students (both FDIC and non-FDIC) to download the materials for their use. Adobe Connect is regulated based on the way that the virtual classroom is configured. Some instructors will require a login, while other instructors will assign a display name along with instructions on how to use their assigned display name. Participating students will receive the virtual classroom information, including the URL, any required login information, or assigned display name information, after they are registered for the course through FDICLearn¹.

SECTION II – DATA TYPE, SOURCES, AND USE

2. Describe all information/data that will be collected, used, maintained or generated by the Outsourced Provider (Vendor) as part of the services provided under the contract. If no information/data is involved, select Not Applicable.

Data consists of training course materials for examiners and leadership-type courses for FDIC and non-FDIC students. Course materials do not contain sensitive data or PII; examiner training materials have been scrubbed for information and contain dummy data. Students may be required to provide first and last name and their e-mail address (work or potentially non-work) to be able to access the virtual classrooms, depending on how the CU administrator configures the classroom. The CU instructors will keep track of the registered students that log into the virtual classroom, either by login or display name, and then will manually record the completion in FDICLearn.

3. Describe the intended purpose and use of the above information/data. If no information/data is involved, select Not Applicable.

The Adobe Connect service supports the online presentation of examiner and leadership-type training course materials, which allows for the upload of CU training course materials by CU administrators and the ability for students to access and download the course materials for their use. Students may be required to provide first and last name and their e-mail address (work or potentially non-work) to access the virtual classrooms, depending on how the CU administrator configures the classroom. Student names and e-mail addresses are used to identify students when the virtual classroom has been configured to require a login. If virtual classrooms are not configured to require a login, student names and e-mail addresses are not required, and students will be identified by pre-assigned display names. Completion of the course is manually recorded in FDICLearn.

¹ FDICLearn is an externally hosted system through which learning activities are managed and delivered. For additional information, refer to the FDIC's FDICLearn Privacy Impact Assessment.

4. What types of personally identifiable information (PII) are (or may be) included in the information specified above? *(This is not intended to be an all-inclusive list. Specify other categories of PII, as needed.):*

PII Element	Yes	No
Full Name	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Date of Birth	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Place of Birth	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Social Security Number	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Employment Status, History or Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Mother's Maiden Name	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Certificates (e.g., birth, death, naturalization, marriage, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Medical Information (Medical Records Numbers, Medical Notes, or X-rays)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Home Address	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Phone Number(s) (non-work)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Email Address (non-work)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Employee Identification Number (EIN)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Financial Information (e.g., checking account #/PINs/passwords, credit report, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Driver's License/State Identification Number	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Vehicle Identifiers (e.g., license plates)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Legal Documents, Records, or Notes (e.g., divorce decree, criminal records, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Education Records	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Criminal Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Military Status and/or Records	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Investigation Report or Database	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Biometric Identifiers (e.g., fingerprint, voiceprint)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Photographic Identifiers (e.g., image, x-ray, video)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other (Specify: _____)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

5. If Social Security Number (SSN) is checked in question 4, please answer the following:

- a) Explain the business purpose requiring the collection of SSNs: N/A
- b) Provide the legal authority which permits the collection of SSNs. N/A
- c) Identify whether the SSN is masked or otherwise truncated as part of the outsourced service: N/A

6a. Please provide an estimate of the number of records maintained by the vendor for this contract that contain PII:

Estimated Number of Records Containing PII				
0	1-500	501-1,000	1,001 - 2,500	2,501 - 5,000
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5,001 - 7,500	7,501 - 10,000	10,001 - 50,000	50,001 - 100,000	over 100,000
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6b. If “0” was answered for 6a, please explain²: N/A

7. What are the sources of data (both PII and non-PII) for the outsourced service/project? How is the data derived?

Data Source³ (List all sources that the Outsourced Provider collects, obtains or receives data from, as part of the services provided under the contract.)	Type of Data Provided by Source & How It is Derived (Describe the type of PII and non-PII data provided by each source. If PII is included in the data, list the specific PII elements, and explain how the PII is derived.)	Does Data Include PII?
CU Administrator	Examiner and Leadership-type Training Course Materials (uploaded via Adobe Connect file upload function.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
External Student(State Bank Personnel)	Full name and e-mail address (work or potentially non-work). *Note: Adobe Connect does not require students to provide their real name or e-mail address. Students can choose how they want to be identified during the session, which can include pseudonyms. They may provide e-mail addresses if they want additional information or answers sent to them from questions raised during the course. CU administrators acquire student e-mails from FDICLearn, to which they send the URL/link for the Adobe Connect course.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Internal Student	Full name and e-mail address (work or potentially non-work). *Note: Adobe Connect does not require students to provide their real name or e-mail. Students can choose how they want to be identified by during the session, which can include pseudonyms. They may provide e-mail addresses if they want additional information or answers sent to them from questions raised during the course. CU administrators acquire student e-mails from FDICLearn, to which they send the URL/link for the Adobe Connect course.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No

8. How will FDIC and/or the Outsourced Service Provider retrieve data or records as part of the outsourced service or project? Can data be retrieved using a personal identifier (e.g., name, address, SSN, EIN, or other unique identifier)?

Full name is displayed while the virtual classroom/course is in session. Student name and record of attendance is not stored within Adobe Connect or in the virtual classroom after the session is complete. The instructor can only visually search for student names listed while the session is in progress, but they do not have the capability to search for names after the session is complete.

² If the vendor has not received work to date for this contract and “0” is checked in 6a, please explain approximately how many records may be maintained by the vendor if they are awarded work under this contract in the future. Additionally, the Division responsible for this vendor must update this PIA to reflect the accurate number of records containing PII that the vendor maintains if this changes in the future.

³ Examples of potential data sources include, but are not limited to: internal (FDIC) or external (non-FDIC) systems, websites, individual members of the public (e.g., customers, borrowers, etc.), FDIC employees, FDIC contractors, credit bureaus, commercial entities, public records, government agencies, etc.

9. In the Federal Register, under which Privacy Act Systems of Record Notice (SORN) does this system operate? Provide number and name. Adobe Connect operates under SORN 30-64-0007, FDIC Learning and Development Records when PII is collected during the registration process.



This completes the PTA.

- Do not complete the rest of the form, if the service provider is not processing or maintaining sensitive PII. This is the case, if you checked:
 - NOT APPLICABLE for question 3 and NO for all items in question 4; OR
 - Only Full Name in question 4.

- Continue completing the remainder of the form, i.e., Sections III thru VI in their entirety (questions 10 through 18), if the service provider is processing or maintaining sensitive PII. This is the case, if you checked:
 - YES for Social Security Number (SSN) in question 4; OR
 - YES for SSN or for Full Name in addition to one or more boxes in question 4.

- If you have questions or are unsure about whether or not you should complete the remainder of this form, please contact your Division ISM or the Privacy Program Office (privacy@fdic.gov).

SECTION III – DATA ACCESS AND SHARING

10. In the table below, specify the systems/applications and parties (FDIC and non-FDIC) that will access or receive PII data as part of the outsourced service/project.

PII Will Be Accessed By and/or Provided To:	Yes	No	If Yes, Explain How and Why the PII Will Be Accessed/Shared
10a. FDIC Outsourced Service Provider (OSP) Staff; OSP Subcontractors; and/or OSP Systems	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Adobe Connect can capture student name and e-mail address (work or potentially non-work) if voluntarily provided by a student. CU administrators and instructors can view the PII, as well as vendor staff if they're monitoring the course during a session. The data is not saved.
10b. FDIC Personnel and/or FDIC Systems/Applications	<input checked="" type="checkbox"/>	<input type="checkbox"/>	CU administrators and instructors can view student names and e-mail addresses (work and potentially non-work).
10c. Individual Members of the Public (e.g., bidders, investors, borrowers, customers, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
10d. Other Non-FDIC Entities/ Parties and/or Non-FDIC Systems/Applications	<input checked="" type="checkbox"/>	<input type="checkbox"/>	External Instructors hired by CU can view student names and e-mail addresses (work and potentially non-work).
10e. Federal, State, and/or Local Agencies	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
10f. Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

11. If data will be provided to, shared with, or maintained by non-FDIC entities (such as government agencies, contractors, or Outsourced Information Service Providers), have any of the following agreements been issued?

Data Protection and/or Sharing Agreements	Yes	No
FDIC Confidentiality Agreement (Corporation)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
FDIC Confidentiality Agreement (Individual)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Non-Disclosure Agreement (NDA)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Memoranda of Understanding (MOU)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Information Sharing Agreements (ISA)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Authentication Risk Assessment	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other Applicable Agreement(s) (Specify: _____)	<input type="checkbox"/>	<input type="checkbox"/>

If you answered NO to any item above, please provide additional information if available: Only training materials are provided; no accountability for the protection of that data is required. This is a subscription services, therefore there is no contract for this Vendor

SECTION IV – NOTICE AND CONSENT

12. Do individuals have the opportunity to decline to provide information or to consent to particular uses of their information (other than required or authorized uses)?

No. Individuals do not have the opportunity to “opt out” of providing their data and/or consenting to particular uses of their information.

Yes. Individuals have the opportunity to decline to provide their personal data or to consent to particular uses of their information. Students do not have to provide their names or e-mail addresses. Registration for the training or leadership-type course is done in FDICLearn for internal students and e-mail for external students. If the virtual classroom is configured to require authentication, and they choose not to provide their data, then they will not be able to participate in the course.

13. If PII is being collected via a public-facing website and/or application as part of this outsourced service, has the Outsourced Information Service Provider posted any of the following types of privacy policies or Privacy Act notices?

No

Yes *(If yes, check applicable box(es) below.)*

Link to FDIC Privacy Policy

FDIC Privacy Act Statement

Contractor Privacy Policy or Statement

No Privacy Policy has been posted

Not applicable

SECTION V – DATA SECURITY AND ACCURACY

14. Please assert what administrative procedures and technical safeguards are in place to protect sensitive PII data in the Outsourced Information Service Provider’s care.

Adobe Connect has gone through the security review required by the FDIC’s Outsourced Information Service Provider Assessment Methodology to determine and/or verify their having appropriate physical, technical and administrative security measures to safeguard FDIC-provided PII and other sensitive data. If it has gone through the Methodology, has it been approved? NO YES

The FDIC conducts background investigations (BIs) on key [Outsourced Information Service Provider name] personnel and other applicable personnel prior to their beginning work on the contract.

The [Outsourced Information Service Provider name] is subject to periodic compliance reviews by FDIC. Per the contract, scheduled and unannounced inspections and assessments of the Outsource Service Provider’s facilities, personnel, hardware, software and its security and privacy practices by either the FDIC information technology staff, the FDIC Inspector General, or the U.S. General Accountability Office (GAO). These inspections may be conducted either by phone, electronically or in-person, on both a pre-award basis

and throughout the term of the contract or task order, to ensure and verify compliance with FDIC IT security and privacy requirements.

Other (Explain any other administrative and/or technical safeguards in place to protect PII data in the Outsourced Information Service Provider's care.) ***Attach the Contract Clause Verification Checklist to the back of this form.***

15. What are the procedure(s) for ensuring that the information maintained is accurate, complete and up-to-date? *(Check all applicable box(es) and insert the appropriate response and System/Project name.)*

Data is collected directly from individuals and/or from the failed financial institutions. As such, the FDIC and its vendors rely on the individuals and/or financial institutions to provide accurate data.

The vendor/contractor works with FDIC to verify the integrity of the data [before, in conjunction with, and/or after] inputting it into the system or using it to support the project.

As necessary, an [authorized user or administrator] of the [System/Project Name] checks the data for completeness by reviewing the information, verifying whether or not certain documents or data is missing, and as feasible, updating this data when required.

Other (*Please explain.*)

16. In terms of assuring proper use of the data, please assert whether the following statements are true for the Outsourced Information Service Provider. *(Check all applicable box(es) and insert the name of the Outsourced Information Service Provider and title of the firm's senior management official.)*

Within FDIC, the Adobe Connect Program Manager/Data Owner, Technical Monitors, Oversight Manager, and Information Security Manager (ISM) are collectively responsible for assuring proper use of the data. In addition, it is every FDIC user's responsibility to abide by FDIC data protection rules which are outlined in the FDIC's Information Security and Privacy Awareness training course which all employees take annually and certify that they will abide by the corporation's Rules of Behavior for data protection.

Additionally, the Outsourced Information Service Provider is responsible for assuring proper use of the data. Policies and procedures have been established to delineate this responsibility, and the vendor has designated [title of senior management official] to have overall accountability for ensuring the proper handling of data by vendor personnel who have access to the data. All vendor personnel with access to the data are responsible for protecting privacy and abiding by the terms of their FDIC Confidentiality and Non-Disclosure Agreements, as well as the vendor's corporate policies for data protection. Access to certain data may be limited, depending on the nature and type of data. (Refer to Section III of this Privacy Impact Assessment for more information on data access criteria.)

The Outsourced Provider must comply with the Incident Response and Incident Monitoring contractual requirement.

None of the above. (*Explain why no FDIC staff or Outsourced Information Service Provider personnel have been designated responsibility for assuring proper use of the data.*)

SECTION VI - DATA RETENTION AND DISPOSAL

17. Where will the Outsourced Service Provider store or maintain the PII data identified in question 4? Describe both electronic and physical storage repositories, as applicable.

The vendor does not maintain the PII, as it is only valid/used during a classroom session.

18. Specify the period of time that data is retained by the Outsourced Service Provider and the specific procedures for disposing of or returning the data at the end of the retention period or contract, whichever is first.

The vendor does not maintain the PII, as it is only valid/used during a classroom session.